



April 23, 2021

Lt. Colonel Mike Dunlap
Wisconsin Air National Guard; 115CES/CRIE
Dane County Regional Airport
3110 Mitchell Street, Building 120
Madison, WI 53704

Subject: Approval of Materials Management Plan for modifications to Building 404, Wisconsin Air National Guard 115CES/CEIE, Dane County Regional Airport. BRRTS # 02-13-585319

Deal Lt. Colonel Dunlap:

The Wisconsin Department of Natural Resources received a Materials Management Plan (MMP) for modifications in and around Building 404 at the Wisconsin Air National Guard (WANG) base located at Truax Field in Madison. The MMP is dated April 11, 2021 and was sent to DNR on that same date. This work is part of actions necessary to prepare the base for the arrival of F-35 aircraft in 2023.

Building 404 is located near the north end of the base and is slated to have additions to the building constructed on the northeast side of the building and on the southwest side of the building. Soil and groundwater samples were collected from each of these locations and tested for Volatile Organic Compounds (VOCs) and for Per and Poly Fluoroalkyl Substances (PFAS). Sample locations and results were summarized in the April 11, 2021 submittal.

Soil

Soil samples were collected from seven locations adjacent the buildings. Two borings were placed on the southwest side of Building 404 in and near the location of that planned addition; five borings were placed on the northeast side of Building 404 in and near the location of that planned addition. Soil samples were collected at approximately one - two feet below the ground surface and then again approximately one foot above the water table in each boring. All borings went to a depth of 12 feet.

No VOC compounds were detected in any of the soil samples.

PFAS compounds were detected five of the seven boring locations near Building 404. Six PFAS compounds were detected (PFBA, PFHxA, PFOA, PFHxS, PFNA and PFOS) in soil. PFOS was the most frequently detected PFAS compound having been detected in four of the five locations where PFAS was detected. The highest concentration of PFOS in soil was 11.5 ng/gm found at E5-20 at a depth of 5' below ground surface.

WANG's MMP indicates that all soil excavated and removed as part of this project will be managed as a solid waste by placing in a solid waste landfill. This is an appropriate method for handling excess soil and base course material. Solid waste landfills in Wisconsin make the decision as to which wastes, they will and will not accept. WANG will need to arrange with the landfill for accepting the material. If an alternative method of soil management is desired, WANG must discuss the proposed management alternative with DNR prior to implementing.

Groundwater

Groundwater was sampled for VOCs and PFAS compounds at all seven locations. The depth to water ranged between 5'-4" to 6'-9". Five different VOCs (4-methyl-2-pentanone, dichlorodifluoromethane, tetrahydrofuran, toluene and trichlorofluoromethane) were detected in water samples from the borings near Building 404. There are NR 140 standards for dichlorodifluoromethane, tetrahydrofuran, and toluene. The concentration of tetrahydrofuran exceeded the NR 140 Preventive Action Limit (PAL) and was less than the NR 140 Enforcement Standard. The concentrations of dichlorodifluoromethane and toluene were below the NR 140 PAL.

Wisconsin currently does not have promulgated groundwater quality standards for any PFAS compounds. However, the Department of Health Services has recommended Enforcement Standards to DNR for several PFAS compounds. Fifteen (15) different PFAS compounds were detected in groundwater from the seven sampling locations. Six of the seven groundwater sampling locations contained concentrations of one or more PFAS compounds above Enforcement Standards recommended by the Department of Health Services.

Groundwater dewatering is not anticipated for this construction project. This is based on depth to water from the borings completed at this location, and from experience WANG has gained from other construction projects WANG has completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered the MMP stated the water will be containerized and sampled, and WANG will work with the DNR to review options for disposing the water based on sampling results.

Plan Approval

The Materials Management Plan is **approved** subject to the following conditions:

1. Management of excavated soil in conformance with the approved materials management plan shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the DNR.
2. The Wisconsin Air National Guard shall manage excavated material in conformance with the approved materials management plan and shall notify the DNR within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the DNR or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the DNR shall be notified within 24 hours and appropriate actions to investigate, evaluate, and deal with the situation shall be proposed. Notification of discharge shall be submitted to the Department in accordance with s. NR 706.05(1).
4. The Wisconsin Air National Guard is responsible for obtaining any local, federal, or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the DNR's Stormwater Manager to determine what, if any, permit is needed.
5. The Wisconsin Air National Guard shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.
6. The Wisconsin Air National Guard shall submit a documentation report to the DNR within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval.
 - b. A narrative description of how the above conditions were accomplished including relevant documentation.

- c. Color photographs documenting construction aspects addressed in this approval.
- d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material.

The DNR reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if the Wisconsin Air National Guard fails to comply with the requirements of the proposed MMP. The DNR also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin".

Steven L. Martin, P.G.
South Central Region Team Supervisor
Remediation & Redevelopment Program Supervisor

Cc: Steve Ales – Remediation & Redevelopment Program